

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

|   |   |                               |
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| <b>In re:</b>                                   | § | <b>Chapter 11</b>             |
|   | § |                               |
| <b>FIELDWOOD ENERGY III LLC, <i>et al.</i></b>  | § | <b>Case No. 20-33948 (MI)</b> |
|   | § |                               |
|   | § | <b>(Jointly Administered)</b> |
| <b>Post-Effective date Debtors.<sup>1</sup></b> | § |                               |

**SECOND STIPULATION AND AGREED ORDER CONTINUING DEADLINE TO  
RESPOND TO CERTAIN OF PLAN ADMINISTRATOR’S CLAIM OBJECTIONS  
AND REQUEST TO RESET HEARING DATE**

[Related to Dkt. Nos. 2844 through 2862]

David Dunn (“Administrator”), as Plan Administrator of Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, Fieldwood Energy Inc., GOM Shelf LLC and FW GOM Pipeline, Inc., Debtors (the “Post-Effective Date Debtors”); Travelers Casualty & Surety Company of America (“Travelers”); Liberty Mutual Insurance Company (“Liberty”); The Hanover Insurance Company (“Hanover”); XL Specialty Insurance Company (“XL”); North American Specialty Insurance Company (“NAS”)<sup>2</sup>; Zurich American Insurance Company (“Zurich”); U.S. Specialty Insurance Company (“USSIC”); HCC International Insurance Company PLC (“HCC”); Everest Reinsurance Company (“Everest”); Sirius America Insurance Company (“Sirius”); Aspen

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<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494); Fieldwood Energy, Inc. (4991, GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore, LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date FWE I Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Offshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703; and Galveston Bay Processing LLC (0422).

<sup>2</sup> N/K/A Swiss Re Corporate Solutions America Insurance Company

American Insurance Company and Aspen Specialty Insurance Company (collectively, “Aspen”); Berkley Insurance Company and Berkley Regional Insurance Company (collectively, “Berkley”); Philadelphia Indemnity Insurance Company (“Philadelphia”); Lexon Insurance Company, Ironshore Specialty Insurance Company, and Ironshore Indemnity Inc. (collectively, “Lexon”); and RLI Insurance Company (“RLI”) (collectively, Travelers, Liberty, Hanover, XL, NAS, Zurich, USSIC, HCC, Everest, Sirius, Aspen, Berkley, Philadelphia, Lexon, and RLI are the “Sureties” and the Sureties, together with the Administrator, the “Parties” and each a “Party”) submit this *Second Stipulation and Agreed Order to Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing* (the “Stipulation”) for entry by the Court, in which the parties stipulate that:

1. WHEREAS, On August 3, 2020 and August 4, 2020 (as applicable, the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the United States Code (the “Bankruptcy Case”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”).

2. WHEREAS, on August 17, 2023, the Administrator filed objections to the Sureties’ proofs of claim as further described in the objections filed at Docket Nos. 2844 through 2862 (collectively, the “Objections”).

3. WHEREAS, on September 11, 2023, the Parties filed the *Stipulation and Agreed Order Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing Date* [Dkt No. 2875].

4. WHEREAS, on September 12, 2023, the Court entered the *Stipulation and Agreed Order Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing* [Dkt No. 2877].

5. WHEREAS, the hearing on the Objections is currently set for January 24, 2024 at 9:00 a.m.

6. WHEREAS, the Sureties' response date to the Objections is currently December 13, 2023.

7. WHEREAS, the Parties have agreed to extend the deadline for the Sureties to respond to the Objections until Tuesday, March 12, 2024 (the "Extended Response Deadline").

8. WHEREAS, for the foregoing reasons, the Administrator and Sureties request a continuance of the January 24, 2024 hearing with respect to the Objections. The Administrator and the Sureties request the hearing be continued until after the Extended Response Deadline to a date that the Court is available.

NOW, THEREFORE, based upon the agreement of the Parties, and for good cause shown, it is hereby **ORDERED, ADJUDGED** and **DECREED** that:

1. The date for the Sureties to respond to the Objections is continued until March 12, 2024.

2. The hearing on the Administrator's Objections [Dkt. Nos. 2844 through 2862] is set for \_\_\_\_\_, 2024 at \_\_\_\_:\_\_\_\_.m.

SIGNED this \_\_\_\_\_ day of \_\_\_\_\_, 2023

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**MARVIN ISGUR**  
**UNITED STATES BANKRUPTCY JUDGE**

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first below written.

Dated: December 5, 2023

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| <p><b>BONDS ELLIS EPPICH SCHAFFER JONES LLP</b></p> <p>By: <u>/s/ Ken Green</u><br/> Ken Green<br/> Texas State Bar No. 24036677<br/> Aaron Guerrero<br/> Texas State Bar No. 24050698<br/> Bryan Prentice<br/> Texas State Bar No. 24099787<br/> 950 Echo Lane, Suite 120<br/> Houston, Texas 77024<br/> Telephone: (713) 335-4990<br/> Facsimile: (713) 335-4991<br/> Email: <a href="mailto:ken.green@bondsellis.com">ken.green@bondsellis.com</a><br/> <a href="mailto:aaron.guerrero@bondsellis.com">aaron.guerrero@bondsellis.com</a><br/> <a href="mailto:bryan.prentice@bondsellis.com">bryan.prentice@bondsellis.com</a></p> <p><b>ATTORNEYS FOR DAVID DUNN, THE PLAN ADMINISTRATOR FOR THE POST-EFFECTIVE DATE DEBTORS</b></p> | <p><b>BAINS LAW PLLC</b></p> <p>By: <u>/s/ Brandon K. Bains</u><br/> Brandon K. Bains<br/> State Bar No. 24050126<br/> P.O. Box 559<br/> Azle, TX 76098<br/> Telephone (214) 494-8097<br/> Email: <a href="mailto:brandon@bainslaw.com">brandon@bainslaw.com</a></p> <p><b>ATTORNEYS FOR LIBERTY MUTUAL INSURANCE COMPANY, THE HANOVER INSURANCE COMPANY, TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA, AND XL SPECIALTY INSURANCE COMPANY</b></p>   |
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